

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
JAB Energy Solutions II, LLC	)	
	)	Case No. 21-11226 (CTG)
Debtor.	)	
	)	<b>Objection Deadline: November 18, 2022</b>

**NINTH MONTHLY APPLICATION OF JOYCE, LLC  
FOR COMPENSATION FOR SERVICES RENDERED AS COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR THE PERIOD FROM  
SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

Joyce, LLC, in accordance with Federal Rule of Bankruptcy Procedure 2016 and Local Rule 2016-2, as well as *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 72], applies under § 330 of the Bankruptcy Code for an award of compensation and reimbursement of actual, reasonable, and necessary expenses as described below:

Name of Applicant:	Joyce, LLC
Authorized to Provide Professional Services to:	Official Committee of Unsecured Creditors
Date of Retention:	November 9, 2021, <i>Nunc Pro Tunc</i> to September 29, 2021
Period for which compensation and reimbursement is sought:	September 1, 2022 through September 30, 2022
Amount of Compensation sought as actual, reasonable and necessary:	\$4,920.00
Amount of Expense Reimbursement sought as actual, reasonable and necessary:	\$0.00

This is a ☒ monthly ☐ interim ☐ final application.

The total time expended for fee application preparation is approximately 3 hours and the corresponding compensation requested is approximately \$1,200.00.

This is the ninth monthly application filed by Joyce, LLC.

**[This Part Intentionally Left Blank]**

**COMPENSATION BY PROFESSIONAL  
SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

<b>Name of Professional Individual</b>	<b>Initials of Professional Person</b>	<b>Position, year assumed position, prior relevant experience, year of obtaining relevant license to practice</b>	<b>Hourly Billing Rate (including changes)</b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Michael Joyce	MJ	Managing Member since 2019. Member of DE bar since 2004. Areas of expertise include bankruptcy, commercial litigation.	\$400	12.3	\$4,920.00
	<b>GRAND TOTAL</b>			<b>12.3</b>	<b>\$4,920.00</b>
			<b>Attorney Compensation</b>		<b>\$4,920.00</b>
			<b>Total Attorney Hours</b>		<b>12.3</b>

**COMPENSATION BY PROJECT CATEGORY**  
**SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

<b>SM/Task</b>	<b>Project Category</b>	<b>Hours</b>	<b>Amount</b>
B110	Case Administration	2.4	\$960.00
B160	Fee/Employment Applications	9.9	\$3,960.00
	<b>TOTAL</b>	<b>12.3</b>	<b>\$4,920.00</b>

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FOR COMPENSATION FOR SERVICES RENDERED AS COUNSEL TO THE  
OFFICIAL COMMITTEE OF UNSECURED CREDITORS, FOR THE PERIOD FROM  
SEPTEMBER 1, 2022 THROUGH SEPTEMBER 30, 2022**

Pursuant to Sections 330 and 331 of title 11 of the United States Code, §§ 101-1532 (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 72] (the “Interim Compensation Order”), Joyce, LLC (“Joyce, LLC”) hereby files this Ninth Monthly Application of Joyce, LLC for Compensation for Services Rendered as Counsel to the Official Committee of Unsecured Creditors, for the Period from September 1, 2022 Through September 30, 2022 (the “Application”). By the Application, Joyce, LLC seeks a monthly allowance pursuant to the Interim Compensation Order with respect to the sum of \$4,920.00 as compensation and \$0.00 for expenses (totaling \$4,920.00) for the period of September 1, 2022 through September 30, 2022 (the “Compensation Period”). In support of this Application, Joyce, LLC respectfully represents as follows:

**PROCEDURAL BACKGROUND**

1. On September 7, 2021 (the “Petition Date”), the above-captioned debtor and debtor in possession (the “Debtor”) filed the voluntary petition with this Court for relief under chapter 11 of the Bankruptcy Code. The Debtor manages and operates its business as debtor in possession under sections 1107(a) and 1108 of the Bankruptcy Code.

2. On September 24, 2021, the Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) appointed the Official Committee of Unsecured Creditors (the “Committee”), consisting of the following three members: (i) Offshore Domestic Group, LLC; (ii) H.B. Rentals, L.C.; (iii) and Sparrows Offshore, LLC. [Docket No. 21].<sup>1</sup>

3. On September 29, 2021, the Committee selected Joyce, LLC as its counsel. [Docket No. 21].

4. On October 21, 2021, the Court entered the Interim Compensation Order. [Docket No. 61].

5. On November 9, 2021, the Court entered its order authorizing the Committee to retain Joyce, LLC as its counsel. [Docket No. 103].

**JURISDICTION, VENUE, AND STATUTORY PREDICATES FOR RELIEF**

6. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code and Bankruptcy Rule 2016.

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<sup>1</sup> H.B. Rentals, L.C. subsequently withdrew from the Committee by letter to the U.S. Trustee.

**SERVICES PROVIDED WERE PERFORMED FOR OR ON BEHALF OF THE COMMITTEE**

7. Joyce, LLC performed all services for which it has requested compensation for or on behalf of the Committee.

8. Joyce, LLC has received no payment and no promises for payment from any source for services rendered or to be rendered in any capacity whatsoever in connection with the matters covered by this Application. There is no agreement or understanding between Joyce, LLC and any other person other than the shareholders of Joyce, LLC for the sharing of compensation to be received for services rendered in this case.

**RELIEF REQUESTED**

9. Joyce, LLC seeks monthly approval and allowance of these fees and expenses incurred as counsel to the Committee during the Compensation Period pursuant to or in accordance with sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, Bankruptcy Local Rule 2016-2, and the Interim Compensation Order.

10. Joyce, LLC fee statement for the Compensation Period is attached hereto as **Exhibit A**. These statements contain daily time logs describing the time spent by each attorney and paraprofessional for the Compensation Period.

11. Summaries of actual and necessary expenses by Joyce, LLC during the Compensation Period are included in Exhibit A.

12. Pursuant to the Interim Compensation Order, Joyce, LLC asks that upon expiration of the Review Period, the Debtor be authorized and directed to pay Joyce, LLC an amount equal to 80% of the fees and 100% of the expenses requested in this Application and detailed in Exhibit A. [Docket No. 72 at 3].

**SUMMARY OF SERVICES**

13. Given the nature and value of the services provided by Joyce, LLC to Committee as described herein, the amounts sought under this Application are fair and reasonable pursuant to section 330 of the Bankruptcy Code.

14. In general, the services that Joyce, LLC rendered as counsel to Committee in the Bankruptcy included, without limitation, the following:

- (a) providing legal advice with respect to the Committee's powers and duties as appointed under Bankruptcy Code section 1102;
- (b) assisting in the investigation of the acts, conduct, assets, liabilities and financial condition of the Debtor, the operation of the Debtor's business, and any other matter relevant to this case or to the formulation of a plan or plans of reorganization or liquidation;
- (c) preparing on behalf of the Committee necessary motions, applications, answers, orders, reports and other legal papers;
- (d) reviewing, analyzing and responding to pleadings filed in this case and appearing before the Court to present necessary motions, applications and pleadings and otherwise protecting the Committee's interests;
- (e) representing the Committee in hearings and other judicial proceedings;
- (f) advising the Committee of its fiduciary duties and responsibilities; and
- (g) performing any and all other legal services in connection with this chapter 11 case as may reasonably be required.

13. The legal services rendered by Joyce, LLC in the bankruptcy have been provided with as little duplication as possible and are detailed by date and project category in Exhibit A.

**VALUATION OF SERVICES**

15. Attorneys and paraprofessionals of Joyce, LLC have expended a total of 17.3 hours in connection with this matter during the Compensation Period, as follows:



<b>SEPTEMBER 1 – SEPTEMBER 30</b>			
<b>Professionals</b>	<b>Hours</b>	<b>Fees</b>	<b>Rate</b>
Michael J. Joyce	12.3	\$4,920.00	\$400.00
<b>Grand Total</b>	<b>12.3</b>	<b>\$4,920.00</b>	

16. The nature of the work performed by these persons is fully set forth in Exhibit A. These are Joyce, LLC's normal hourly rates for work of this character. The reasonable value of the services rendered by Joyce, LLC to the Committee during the Compensation Period is \$4,920.00.

17. In accordance with the factors enumerated in Section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by Joyce, LLC is fair and reasonable given (a) the complexity of this case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services and (e) the costs of comparable services other than in a case under this title. Moreover, Joyce, LLC has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Rule.

**WHEREFORE**, Joyce, LLC respectfully requests that the Court authorize that, for the Compensation Period, an allowance be made to Joyce, LLC pursuant to the terms of the Interim Compensation Order, with respect to the sum of \$4,920.00 as compensation for necessary professional services rendered (80% of which equals \$3,936.00 ) and \$0.00 as reimbursement for actual and necessary expenses, such \$4,920.00 total sum be authorized for payment, and the Court grant such other and further relief as it may deem just and proper.

Dated: October 28, 2022

**JOYCE, LLC**

/s/ Michael J. Joyce

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